

United States District Court

EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAURIE JEAN MARTIN,

Defendant.

CRIMINAL COMPLAINT

Case No. 21-MJ-71-SPS

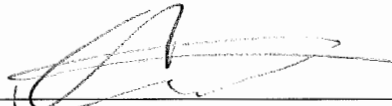
I, Constantine Bucuvalas, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about November 20, 2016, in the Eastern District of Oklahoma, defendant violated Title, 18 United States Code, Sections 1151, 1153, and 1111(a), an offense described as follows: **MURDER IN INDIAN COUNTRY.**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Constantine Bucuvalas, which is attached hereto and made a part hereof by reference.)


☒ Continued on the attached sheet.


Constantine Bucuvalas
Complainant

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: March 18, 2021

UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer


Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Constantine Bucuvalas, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been since August of 2020. I have been employed as a Special Agent of the FBI for approximately eight months. I am currently assigned to the Oklahoma City Division, Muskogee Resident Agency. Prior to my employment with the FBI, I served for eight years in the United States Air Force, predominately in Security Forces. In the course of my duties as Special Agent, I have investigated criminal violations related to Indian Country crimes, as explained in 18, United States Code, Section 1151 and as it pertains to the Major Crimes Act (MCA).

2. As a Federal Agent, I am authorized to investigate violation of the laws of the United States, and to execute warrants issued under the authority of the United States. Acting in that capacity I received information regarding a crime which occurred in Ardmore , Oklahoma within the boundaries of the Chickasaw Nation and the Eastern District of Oklahoma. This affidavit is intended to show there is sufficient probable cause for a Complaint and does not set forth all of my knowledge about this matter. This affidavit is made in support of a complaint and Arrest Warrant for the crime of Murder in Indian Country in violation of Title 18, United States Code, Sections 1151, 1153, and 1111. In support of this request, I submit the following:

3. At approximately 2211 hours on November 20, 2016, Officer Adam Eller of the Ardmore Police Department was called to E St and 5th Avenue Northwest in Ardmore in regard to a stabbing that had occurred. Witnesses led Ardmore Police Department to suspect Laurie

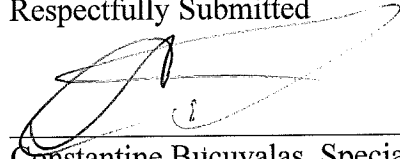
Jean Martin, and several others were involved. Bloody knives, brass knuckles, and a baseball bat were found in a vehicle associated with the suspects.

4. Further investigation by the Ardmore Police Department found the victim of the assault to be Chivas Laray Piggee. Investigation revealed Laurie Martin, seeking the assistance of others to assault Piggee, drove Piggee to her home knowing that her accomplices were awaiting their arrival with the intent for said accomplices to ambush and assault Piggee. After Martin arrived with Piggee, the accomplices challenged Piggee to a fight causing Piggee to flee. The accomplices chased and captured Piggee and then assaulted and battered Piggee, encouraged by Laurie Martin. Piggee was stabbed numerous times in the leg and buttock with a knife and said act did result in the death of Chivas Piggee on 11-22-2016.

5. Martin is a member of the Chickasaw Nation, a federally recognized Indian Tribe.

Based on a review of this case, and based on my knowledge and experience with violent crime in Indian Country, I, as your affiant have probable cause to believe **LAURIE JEAN MARTIN** committed the offense of Murder in Indian Country in violation of 18 United States Code Sections 1151, 1153, and 1111(a).

Respectfully Submitted



Constantine Bucuvalas, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 18th day of March, 2021.



UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF OKLAHOMA